

1 D. NEAL TOMLINSON
Nevada Bar No. 06851
2 neal@hyperionlegal.com
KRISTINA R. KLEIST
3 Nevada Bar No. 13520
kristina@hyperionlegal.com
4 Hyperion Advisors
3960 Howard Hughes Parkway, Suite 500
5 Las Vegas, Nevada 89169
Telephone: (702) 990-3901
6 Fax: (702) 999-3501

7 *Attorneys for Defendants*

8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10
11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

14 OMICS GROUP INC., et al.,

15 Defendants.
16

Case No. 2:16-cv-02022-GMN-VCF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND RESPONSE
DEADLINE

17 Defendants, OMICS GROUP INC., IMEDPUB LLC, CONFERENCE SERIES LLC,
18 and SRINUBABU GEDELA, by and through counsel of record, D. Neal Tomlinson and
19 Kristina R. Kleist, and Plaintiff, FEDERAL TRADE COMMISSION, by and through counsel of
20 record, Gregory A. Ashe and Michael E. Tankersley, hereby agree and stipulate as follows:

- 21 1. On May 1, 2018, Plaintiff filed its Motion to for Summary Judgment, (Dkt. No. 86).
- 22 2. Defendants also filed their Motion for Summary Judgment on May 1, 2018 (Dkt. No.
- 23 89).
- 24 3. Plaintiff's Motion for Summary Judgment is quite extensive, being over 50 pages
- 25 itself and referencing 27 exhibits, including a declaration with exhibits of over 1,000
- 26 pages.
- 27 4. Plaintiff also filed a Motion for Sanctions and Motion to Compel on May 9, 2018
- 28 (Dkt. Nos. 92, 94).

1 5. Defense counsel has still been dealing with pressing family medical issues which has
2 continued to require counsel to be out of the office, and additional time is needed to
3 confer with Defendants and respond to Plaintiff's Motions.

4 6. Plaintiff's counsel has agreed to extend the May 22, 2018 response date to the
5 Motion for Summary Judgment and the May 23, 2018 response date for the Motion
6 for Sanctions and Motion to Compel to June 1, 2018.

7 7. This Stipulation is being made in good faith between and at the request of both
8 parties, and not for purposes of delay.

9 HYPERION ADVISORS

FEDERAL TRADE COMMISSION

10 Dated this 16th day of May, 2017.

Dated this 16th day of May, 2017.

11 /s/ D. Neal Tomlinson

/s/ Michael E. Tankersley

12 D. NEAL TOMLINSON

ALDEN F. ABBOTT

13 Nevada Bar No. 06851

Acting General Counsel

14 KRISTINA R. KLEIST

GREGORY A. ASHE

15 Nevada Bar No. 13520

MICHAEL E. TANKERSLEY

16 3960 Howard Hughes Parkway, Suite 500

Federal Trade Commission

17 Las Vegas, Nevada 89169

600 Pennsylvania Avenue NW

Washington, DC 20850

18 Attorneys for Defendants

Attorneys for Plaintiff

ORDER

Pursuant to the stipulation of the parties, the deadline for both parties to file their respective responses to the Motions for Summary Judgment is hereby extended to June 1, 2018. Additionally, Defendants shall have until June 1, 2018 to respond to Plaintiff's Motion for Sanctions and Motion to Compel.

IT IS SO ORDERED.


Dated this 22 day of May, 2018.

Respectfully submitted by:

HYPERION ADVISORS

/s/ D. Neal Tomlinson

D. NEAL TOMLINSON
Nevada Bar No. 06851
KRISTINA KLEIST
Nevada Bar No. 13520
Attorneys for Defendants



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 16, 2018, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE** was filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ D. Neal Tomlinson
Attorney for Defendants